

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC.,
ALTERNET MEDIA, INC.,
Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC,
Defendants.

Case No. 1:24-cv-01514-CM-OTW

**[PROPOSED] ORDER
GRANTING MOTION TO
ADMIT COUNSEL
PRO HAC VICE**

The motion of Andrew M. Gass for admission to practice *pro hac vice* in the above captioned action is granted.

Applicant has declared that he is a member in good standing of the Bar of the State of California and that his contact information is as follows:

Applicant's Name: Andrew M. Gass

Firm Name: Latham & Watkins LLP

Address: 505 Montgomery Street, Suite 2000

City/State/Zip: San Francisco, CA 94111

Telephone: (415) 391-0600 / Facsimile: (415) 395-8095

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC, (together, "OpenAI") in the above entitled action;

IT IS HEREBY ORDERED that Applicant is admitted to practice *pro hac vice* in the above-captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: _____, 2024

United States District Judge Colleen McMahon